



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SE-5J

May 8, 2007

VIA FACSIMILE AND FIRST-CLASS MAIL

Stephen Garbaciak, Jr., PE
Vice-President
ARCADIS U.S. Inc.
30 W. Monroe Street, Suite 1710
Chicago, IL 60603

US EPA RECORDS CENTER REGION 5



406968

Re: Modification to Work Plan for the Plainwell Impoundment Time-Critical
Removal Action, Docket No. V-W-07-C-863

Dear Mr. Garbaciak:

On April 25, 2007, U.S. EPA and the State of Michigan approved certain changes to the Work to be performed by Millennium Holdings, LLC and Georgia-Pacific LLC under the terms of the Administrative Settlement Agreement and Order on Consent for a time-critical removal action at the Plainwell Impoundment area of the Allied Paper/Portage Creek/Kalamazoo River Superfund site, Docket No. V-W-07-C-863 (the "Settlement Agreement").

U.S. EPA believes that the Work Plan for the removal action at the Plainwell Impoundment, Appendix 4 to the Settlement Agreement, must be amended to reflect the approved change in the disposal location for wastes excavated and/or dredged during the 2007 construction season. Pursuant to Section XXVII, ¶ 74 of the Settlement Agreement, therefore, and after consulting with MDEQ, U.S. EPA requires the amendment of Section 3.7 of the Work Plan (Transportation and Disposal of Soils and Sediments) to include the following provision:

All Waste Material, as that term is defined in the Order, excavated, dredged or otherwise removed from the Plainwell Impoundment area during the 2007 construction season, will be designated and segregated as TSCA and non-TSCA waste using the methodology approved by U.S. EPA in connection with response actions at the Lower Fox River site in Wisconsin, as described in the 2007 Pre-Final Design Report and Remedial Action Work Plan, dated March 2007. Figure 1 (Classification of Soil and Sediment Removal Areas by PCB Concentration) depicts the application of that methodology to the Plainwell

Impoundment area. During the 2007 construction season, all Waste Material with PCB concentrations equal to or greater than 50 mg/kg, as identified on Figure 1, shall be transported off-Site to a chemical waste landfill that is in compliance with all state and federal regulatory requirements. Except as otherwise provided in Section 2.1.4.3 of this report, during the 2007 construction season, all Waste Material with PCB concentrations less than 50 mg/kg shall be transported off-Site to an appropriately licensed and/or permitted commercial landfill.

Figure 1 (Classification of Soil and Sediment Removal Areas by PCB Concentration), enclosed with this letter, should be added to the Work Plan as an additional figure.

Because no decision has yet been made with regard to disposal of wastes from the Plainwell Impoundment area during the 2008 construction season, U.S. EPA is not currently requiring modification of each section of the Work Plan at which disposal at the Allied operable unit is discussed. After a decision is made with regard to the disposal of wastes during 2008, however, the Work Plan may need further modification.

If you have any questions, please do not hesitate to call me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Samuel Borries". The signature is fluid and cursive, with a large initial "S" and "B".

Samuel Borries
On-Scene Coordinator

enclosure

cc: B. Barnett, Esq.
M. Davis, Esq.
S. Cook, Esq.
E. Furey
P. Bucholtz (MDEQ)
J. Saric

